

September 13, 2018

MEMORANDUM

Subject: Contract EP-C-15-022, Work Assignment 3-96

From: Bruce Suchomel, Work Assignment Contracting Officer Representative

Thru: Nancy Parrotta, Contract Level Contracting Officer's Representative

To: Lisa Mitchell-Flinn, Contracting Officer

Contract Clause EPAAR 1552.211-74, "Work Assignments" provides the contractor with information on the WA process and the content that will be provided in an awarded WA document issued by the CO under cost-reimbursement contracts. In November 2009, deviation was issued to the prescription for EPAAR 1552.21-74, which stated that when the WA is issued, the IGCE LOE should not be released to the contractor. However, in cases where the uncertainties involved in the effort are of such magnitude that there is no reasonable expectation that the contractor can estimate the level of effort required by the tasks, objectives, or outcomes of the requirement, the CO may provide a ceiling level of effort for the entire work assignment at the time of its issuance.

In this instance, it is necessary for the contractor to be provided with the LOE for the subject. This work assignment supports the EPA Region 8 Underground Injection Control Dewey-Burdock Permitting Actions. As such, there are several uncertainties inherent to this type of work, particularly the amount of time needed to conduct an adequate review of technical literature, developing annotated bibliographies, and developing acceptance criteria for adequate compliance with permit requirements. For this reason, there is no reasonable expectation that the contractor could accurately estimate the level of effort required. To assist the contractor in determining the necessary level of effort, we recommend the contractor be provided the Government's LOE estimate. The Government's estimate will be used as the basis for the contractor's resource projection.

The LOE for this Work Assignment is 1045 hours.